

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 15-10997
Colleen F Blaha,)	Chapter 13
)	
Debtor(s).)	Judge Donald R. Cassling

NOTICE OF MOTION

To: Colleen F Blaha, 1026 69th St, Darien, IL 60561 *via US Mail*
Glenn B Stearns, Chapter 13 Trustee *notice via ECF delivery system*
The United States Trustee *notice via ECF delivery system*
BMO Harris Bank N.A., Attn: BRK-180-RC, 770 N. Water St., Milwaukee, WI 53202
via US Mail
See attached service list

On March 4, 2016 at 9:30 a.m. or soon thereafter as I may be heard, I shall appear before Bankruptcy Judge Donald R. Cassling or any other Bankruptcy Judge presiding at Kane Courthouse, 100 S 3rd Street, Courtroom 240, Geneva, Illinois 60134, and shall present the MOTION TO AUTHORIZE SALE OF REAL ESTATE, at which time you may appear if so desired.

/s/ David H. Cutler
David H. Cutler, esq.
Attorney for Debtor(s)
Cutler & Associates Ltd.
4131 Main St.
Skokie IL 60076
(847) 673-8600

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Notice and Motion was filed AND sent electronically and via US MAIL to the above captioned by 5:00 p.m. on or before February 19, 2016.

/s/ David H. Cutler
Attorney for Debtor(s)

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MOTION TO AUTHORIZE SALE OF REAL ESTATE

NOW COMES, the Debtor, COLLEEN F BLAHA (hereinafter referred to as “DEBTOR”), by and through her attorneys, Cutler and Associates, Ltd., and moves this Honorable Court for entry of an Order Authorizing the Sale of Real Estate, and in support thereof, respectfully represent as follows:

1. On March 26, 2015 the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. The Debtor’s Chapter 13 Plan was confirmed on June 19, 2015.
3. The confirmed Plan calls for monthly payments of \$160 (one hundred and sixty) per month for 14 (fourteen) months and \$715 (seven hundred and fifteen) per month for 46 (forty-six) months, with unsecured creditors receiving 100% (one hundred percent) of their timely filed or allowed claims.
4. The Debtor wishes to sell a property located at 1026 69th St, Darien, IL 60561 (“Property”) and she has found a purchaser. The Debtor has entered into a contract for a sale of the property for \$310,000.00 (three hundred and ten thousand point zero zero) (see Exhibit A).
5. Debtor’s property is encumbered by a mortgage with BMO Harris Bank N.A., with the claim of \$229,877.37 (two hundred and twenty-nine thousand eight hundred seventy-seven point thirty-seven).

6. The automatic stay has not yet been lifted from the property.
7. Any proceeds from the sale received by the Debtor after the allowed exemptions shall be turned over to trustee.

WHEREFORE, DEBTOR prays that this Honorable Court enter an order authorizing the sale of the real estate located at 1026 69th St, Darien, IL 60561.

Respectfully submitted,

By: /s/ David H. Cutler
David H. Cutler, esq.
Attorney for Debtor(s)
Cutler & Associates Ltd.
4131 Main St.
Skokie IL 60076
(847) 673-8600